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VIA COURIER

William F. Caton, Secretary
Federal Communications Commission
1919 M Street
Washington, D.C. 20554

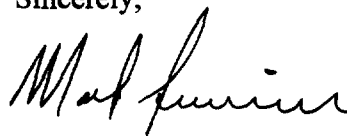
Re: Notice of Ex Parte Contact by MFS Communications Company,
Inc., in CC Docket Nos. 91-141 and 94-97/Phase II

Dear Mr. Caton:

In accordance with §§ 1.1206(a)(2) of the Commission's Rules, I am filing this letter as notice that this is in response to a request made by Paul D'Ari at our meeting on March 8 (with Claudia Fox, myself and Erin Reilly) for information about various physical collocation topics.

If you have any questions or need additional information, please call me at 424-7872 or Robert McCausland at (708) 203-2505.

Sincerely,



Mark Sievers

Enclosures

cc: Regina Keeney
James Schlichtling
Richard Welch
Robert McCausland

Paul D'Ari
Claudia Fox
ITS



**MFS'S RESPONSES TO COLLOCATION ISSUES
RAISED AT MARCH 8, 1996 MEETING**

1. **What is the capacity (expressed in DS-1 equivalents using OC-3 equipment) of a 100 square foot area used by a physical collocator?**

Attachment A is a document developed by MFS engineers that shows their estimate of the capacity of a 100 square foot area used for physical collocation purposes. The document presents four scenarios that differ in how the interconnectors' OC-3s are configured.

2. **What is a good measure or standard to use to determine whether space is being used or merely warehoused?**

Attachment B, ***Proposed Guidelines for Efficient Utilization of Physical Collocation Space***, presents MFS's suggested methodology for determining whether central office space used for collocation is actually being used or merely warehoused. The document also presents a worksheet example of how the guidelines are applied.

In general, the guidelines allow for a collocator to expand its collocation space whenever it can show that the *Capacity Inventory* is less than or equal to the *Space-Preparation Time* plus 45 days.

Capacity Inventory is the number of days until the collocator runs out of capacity due to a lack of collocation space. It is a good faith estimate by the collocator of the capacity exhaustion dates for (1) local services (*i.e.*, dialtone services), and (2) transmission services (*i.e.*, private line, special access and switched transport DS1/DS3 services). The smaller of (1) or (2) is employed in the guidelines. The collocator's estimate can be verified, when necessary, through a joint local exchange carrier/collocator review of in-service equipment, service growth trends and forecasts.

Space-Preparation Time is the number of days required by the local telephone company to prepare additional space and the number of days required by the collocator to activate its collocated equipment.

In other words, the guidelines proposed by MFS would allow a collocator to expand its collocation space whenever its estimate of capacity exhaustion was less than 45 days of the *Space-Preparation Time*. For example, if capacity exhaustion was predicted within 145 days, and it required 135 days to prepare the space and activate the equipment, then, under MFS's proposed guidelines, it is appropriate to expand collocation space. If the *Space Preparation Time* was only 30 days, then no expansion would be warranted yet.

Central to the guidelines are a requirement that local telephone companies include in their tariffs intervals for initial space availability, space expansions, power delivery, network cabling and capacity expansions to meet cross-connect demand and circuit establishment intervals for cross-connects. Absent such tariffed intervals, local telephone companies would be unable to enforce the proposed guidelines in a nondiscriminatory fashion.

3. What are the insurance requirements of the commercial real estate market that may be relevant to collocators?

MFS regularly deals with landlords when installing its equipment in buildings to serve customers. MFS's standard license agreement offers \$2 million in insurance coverage. For companies like MFS, insurance is covered by the parent company's blanket policy with certain other amounts covered by an insurance rider.

4. Should local exchange carriers (LECs) honor letters of agency (LOAs) allowing parties other than the interconnector, such as interexchange carriers (IXCs), to negotiate for, order and be billed for services on the interconnector's behalf?

This issue was recently dealt with by the Commission in an order denying a NYNEX petition for waiver.¹ NYNEX refused to allow an IXC to order and be billed for cross-connect services, asserting that the Commission's rules prohibited it from allowing a party other than the interconnector from ordering expanded interconnection-type services. The Commission held that its rules and orders do not prohibit or restrict carriers from entering into such agency agreements.

MFS recommends that the Commission allow IXCs and other customers of collocators to obtain LOAs from collocators to order and be billed for various interconnection services. LOAs greatly streamline and enhance the efficiency of physical interconnection and should be allowed.

5. To what extent should an interconnector have channel assignment control?

Channel assignment control and control of the physical cable tie down are typically negotiated between MFS and the LECs it interconnects with. LEC operations personnel who actually manage circuits seem to prefer giving the interconnector channel assignment control since it streamlines the interconnection process. Clearly, MFS prefers having that control, as well. In

¹ *In the Matter of NYNEX Telephone Companies Petition for Waiver of Part 69 of the Commission's Rules*, DA 96-289, Order (Released March 5, 1996).

Boston where MFS lacks control of cable tie down, the lack of control has proven to be awkward and inefficient for MFS. Without channel assignment control and cable tie down control, MFS must submit an order and wait for the LEC to respond with a Design Layout Record (DLR), which is basically a provisioning plan. With channel assignment control and cable tie down control, MFS can simply specify how a cable should be connected with the LEC's DSX panel (*e.g.*, specify the bay, jack, etc. that the cable should be connected to) and the LEC and MFS can quickly and simultaneously engineer their respective portions of the interconnection. Said differently, channel assignment control and cable tie down control, simplify the interconnection process by eliminating unnecessary DLRs and inefficient communications between the interconnector and the LEC.

ATTACHMENT A

CAPACITY (IN OC-3 EQUIVALENTS) PER 100 SQUARE FEET

ASSUMPTION: Six (6) bays maximum per 100 square feet of space.

Scenario 1: All DS3 Hand-offs

$$\begin{array}{ccccccc} 5 \text{ OC3s} & & 6 \text{ Bays} & & 3 \text{ DS3s} & & 28 \text{ DS1s equiv} \\ \text{Bay} & \times & & \times & \text{OC3} & \times & \text{DS3} \end{array} = 2520 \text{ DS1 equiv}$$

Scenario 2: All DS1 Hand-offs

$$\begin{array}{ccccccc} 5 \text{ OC3s} & & 4 \text{ Bays} & & 84 \text{ DS1s} & & \\ \text{Bay} & \times & & \times & \text{OC3} & = & 1680 \text{ DS1s} \end{array}$$

Remaining two (2) bays hold DSX1 cross connect equipment

Scenario 3: All OC3 Hand-offs (Least probable scenario)

$$\begin{array}{ccccccc} 6 \text{ OC3s} & & 6 \text{ Bays} & & 3 \text{ DS3s} & & \\ \text{Bay} & \times & & \times & \text{OC3} & = & 108 \text{ DS3 equiv} \end{array}$$

$$108 \text{ DS3 equiv.} \times 28 \text{ DS1 equiv.} = 3024 \text{ DS1 equiv}$$

Remaining 1.3 bays hold DSX1 cross connect equipment

Scenario 4: DS3/DS1 Combination (Most probable scenario.)

Assume each OC3 is configured for 1 DS3 and 56 DS1s

$$4 \text{ Bays e/w } 5 \text{ OC3s} + 1 \text{ Bay e/w } 3 \text{ OC3s} = 23 \text{ OC3s}$$

$$\begin{aligned} 1 \text{ OC3} &= 1 \text{ DS3} + 56 \text{ DS1s} \\ 23 \text{ OC3s} &= 23 \text{ DS3s} + 23 (56) \text{ DS1s} \\ &= 23 \text{ DS3s} + 1288 \text{ DS1s} \\ &= 644 \text{ DS1 equiv} + 1288 \text{ DS1} \\ &= 1932 \text{ DS1 equiv} \end{aligned}$$

ATTACHMENT B

PROPOSED GUIDELINES FOR EFFICIENT UTILIZATION OF PHYSICAL COLLOCATION SPACE

PURPOSE STATEMENT: To avoid space warehousing in central offices where space is not abundant while ensuring that sufficient time exists for LECs to deliver additional space and infrastructure items to a requesting collocator and for collocators to place into service new equipment in that space before a capacity exhaust is encountered by the collocator for any of its service types.

METHODOLOGY:

*Expansion is permitted when **CAPACITY INVENTORY** \leq (**SPACE-PREP TIME** + 45 days).*

CAPACITY INVENTORY: (the number of days until the collocator encounters a capacity exhaust for any of its services due to lack of collocation space) Separate calculations must be performed for the following services with the lowest of the two numbers being used: 1) Transmission Services (private line, special access and switched transport DS1/DS3 services) and 2) Local Services (dialtone services). This computation must include both interstate and intrastate services provided through the collocation space.

SPACE-PREP TIME: (LEC space-availability interval + collocator equipment activation interval) Space-Prep Time is reflected in number of days and includes the time for all infrastructure items (space, power, LEC network capacity, etc.) to be provided by the LEC, the time for collocators to install and activate new equipment, the time necessary for joint LEC/collocator equipment and circuit testing and the time needed by the LEC to meet new orders for cross connects to the collocator's newly-installed equipment.

OTHER GROUND RULES: LECs which do not include in their tariffs intervals for initial space availability, space expansions (which should be less than intervals for initial space availability), power delivery, network cabling and capacity expansions to meet cross-connect demand and circuit-establishment inter cross connects (which should be less than intervals for non-collocation) would not be able to effectively enforce the above provisions and are required to treat all collocators in a non-discriminatory fashion.

EFFICIENT SPACE UTILIZATION ANALYSIS

STEP 1: CAPACITY INVENTORY CALCULATION

- 1A) Transmission Equipment Capacity Remaining for All Available Space: _____ days
1B) Local Services Equipment Capacity Remaining for All Available Space: _____ days
1C) Insert the Lower of 1A and 1B, Above: _____ days (Enter this number into 3A, below.)

STEP 2: SPACE-PREP TIME CALCULATION

- 2A) LEC Tariff Interval for New Physical Collocation Space (applies when new common collocation infrastructure area must be constructed for the expanded space): _____ days
2B) LEC Tariff Interval for Expanded Physical Collocation Space (applies when common collocation infrastructure area for expansions already exists): _____ days
2C) Enter the Number From 2A or 2B, Whichever Applies: _____ days
2D) Number of Days Exceeding 2C Above for Delivery of Additional LEC Power (if applicable): _____ days
2E) Number of Days Exceeding 2C Above for Delivery of Additional LEC Transmission Cabling or Loop Links (if applicable): _____ days
2F) Number of Days Exceeding 2C Above for Availability of Additional LEC Network Capacity to Meet Collocator Demand (if applicable): _____ days
2G) Number of Days Exceeding 2C Above for Availability of Inter-Space Racking (applicable only if expanded space is non-contiguous): _____ days
2H) Number of Days Exceeding 2C Above for Availability of Other LEC-Provided Items (identify such items): _____ days; Item(s): _____
2I) Enter the *Highest* Number from 2D, 2E, 2F, 2G and 2H, Above: _____ days
2J) Number of Days for Collocator to Install Equipment in New Space: _____ days
2K) Number of Days for Joint LEC/Collocator New Circuit and Equipment Testing: _____ days
2L) LEC Tariff Interval for Installation of New Cross-Connect Services (applies for the new collocation equipment in the new space): _____ days
2M) Enter the Summation of 2C, 2I, 2J, 2K and 2L, Above: _____ days
2N) Add 45 Days to the Total from 2M, Above, and Enter the Total Here: _____ days (Enter this number into 3B, below.)

STEP 3: EXPANSION-PERMISSIBILITY TEST

- 3A) Capacity Inventory - Enter the Number of Days from 1C, Above: _____ days
3B) Space-Prep Time - Enter the Number of Days from 2N, Above: _____ days
3C) If 3A \leq 3B, Expansion is Permitted.

HYPOTHETICAL EXAMPLE

EFFICIENT SPACE UTILIZATION ANALYSIS

STEP 1: CAPACITY INVENTORY CALCULATION

- 1A) Transmission Equipment Capacity Remaining for All Available Space: 280 days
1B) Local Services Equipment Capacity Remaining for All Available Space: 145 days
1C) Insert the Lower of 1A and 1B, Above: 145 days (Enter this number into 3A, below.)

STEP 2: SPACE-PREP TIME CALCULATION

- 2A) LEC Tariff Interval for New Physical Collocation Space (applies when new common collocation infrastructure area must be constructed for the expanded space): 120 days
2B) LEC Tariff Interval for Expanded Physical Collocation Space (applies when common collocation infrastructure area for expansions already exists): 90 days
2C) Enter the Number From 2A or 2B, Whichever Applies: 90 days
2D) Number of Days Exceeding 2C Above for Delivery of Additional LEC Power (if applicable): 15 days
2E) Number of Days Exceeding 2C Above for Delivery of Additional LEC Transmission Cabling or Loop Links (if applicable): 5 days
2F) Number of Days Exceeding 2C Above for Availability of Additional LEC Network Capacity to Meet Collocator Demand (if applicable): 0 days
2G) Number of Days Exceeding 2C Above for Availability of Inter-Space Racking (applicable only if expanded space is non-contiguous): 7 days
2H) Number of Days Exceeding 2C Above for Availability of Other LEC-Provided Items (identify such items): 0 days; Item(s):
2I) Enter the *Highest* Number from 2D, 2E, 2F, 2G and 2H, Above: 15 days
2J) Number of Days for Collocator to Install Equipment in New Space: 20 days
2K) Number of Days for Joint LEC/Collocator New Circuit and Equipment Testing: 2 days
2L) LEC Tariff Interval for Installation of New Cross-Connect Services (applies for the new collocation equipment in the new space): 8 days
2M) Enter the Summation of 2C, 2I, 2J, 2K and 2L, Above: 135 days
2N) Add 45 Days to the Total from 2M, Above, and Enter the Total Here: 180 days (Enter this number into 3B, below.)

STEP 3: EXPANSION-PERMISSIBILITY TEST

- 3A) Capacity Inventory - Enter the Number of Days from 1C, Above: 145 days
3B) Space-Prep Time - Enter the Number of Days from 2N, Above: 180 days
3C) If $3A \leq 3B$, Expansion is Permitted.